

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
DUBLIN DIVISION**

CHRISTOPHER BAUGHCUM, JR., et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 3:21-cv-
	)	00036-DHB-BKE
GENOLA JACKSON, et al.,	)	
	)	
Defendants.	)	
	)	

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**STATEMENT OF UNDISPUTED MATERIAL FACTS IN SUPPORT  
OF PLAINTIFFS' CROSS-MOTION FOR SUMMARY JUDGMENT**

Pursuant to Local Rule 56.1, Plaintiffs submit this statement of undisputed material facts in support of their cross-motion for summary judgment, filed concurrently:

1. Plaintiffs Baughcum, Meyers, and Long (“Individual Plaintiffs”) are residents of Georgia, over eighteen, but younger than twenty-one years old. None of the Individual Plaintiffs have ever been charged with or convicted of any offense that would prevent acquiring a carry license, and nothing except their age prevents them from acquiring a license. Baughcum Decl. ¶¶ 1, 3; Meyers Decl. ¶¶ 1, 3; Long Decl. ¶¶ 1, 3.
2. The Individual Plaintiffs are acquainted with the proper and safe handling, use, and storage of handguns and handgun ammunition. Baughcum Decl. ¶ 4; Meyers Decl. ¶ 4; Long Decl. ¶ 4.
3. The Individual Plaintiffs are members of the Firearms Policy Coalition. Baughcum Decl. ¶ 2; Meyers Decl. ¶ 2; Long Decl. ¶ 2.
4. Baughcum owns a Smith and Wesson EZ Shield Handgun. He is a student and works part-time at a machine shop. He is concerned about rising violent crime in his area. His

job requires him to travel alone to higher crime areas to drop off products and pick up raw materials. If he were not prevented from acquiring a carry license because of his age, he would apply for one forthwith. Upon issuance, he would on occasion carry a handgun for self-defense. Baughcum Decl. ¶ 6.

5. Meyers owns a handgun. He works full time as an electrician. His work frequently requires him to travel to work sites alone in a truck that contains valuable tools and equipment. If he were not prevented from acquiring a carry license because of his age, he would apply for one forthwith. Upon issuance, he would on occasion carry a handgun for self-defense. Meyers Decl. ¶ 6.
6. Long is a full-time student, dual enrolled in high school and community college classes. She works part-time as a barista and frequently goes into town to run errands, shop, or get gasoline. The area has a local reputation for street crime and Long and her friends have been harassed when out in public. If she was not ineligible for a carry license because of her age, she would apply for one forthwith. Upon issuance, she would on occasion carry a handgun for self-defense. Long Decl. ¶ 6.
7. Plaintiff Firearm Policy Coalition is a nonprofit organization dedicated to promoting the right to keep and bear arms. FPC's members include adults in Georgia between the ages of eighteen and twenty-one, including the Individual Plaintiffs, who would acquire carry licenses if not for their age. Combs Decl. ¶ 3–6.

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Respectfully Submitted,

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